

JUN 06 2011

Lyn Utrecht Utrecht & Phillips, PLLC 1900 M St. NW Suite 500 Washington, DC 20036

**RE:** MUR 6411

America's Families First Action Fund and David Rudd, in his official capacity as treasurer

Dear Ms. Utrecht:

On November 1, 2010, the Federal Election Commission ("Commission") notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. On May 31, 2011, the Commission found, on the basis of the information in the complaint and information provided by you, that there is no reason to believe Annaisa's Families First Action Fund and David Rudd, in his official especity at treasum, vialuated 2 U.S.C. §§ 441a(a) or 441b. Accordingly, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009). The Factual and Legal Analysis, which explains the Commission's finding, is enclosed for your information.

If you have any questions, please contact Ana Peña-Wallace, the atterney assigned to this matter at (202) 694-1650.

Sincerely,

Peter G. Blumberg
Assistant General Counsel

Enclosure
Factual and Legal Analysis